



Ms. Marlene H. Dortch; Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

April 23, 2010

Re: IB Docket No. 95-91, WT Docket, No. 07-293, and
GN Docket Nos. 09-47, 09-51, and 09-137

Dear Ms. Dortch:

The Alliance of Automobile Manufacturers (Alliance),¹ wishes to express its concern with the recently proposed changes to the WCS service rules.² In our earlier filing in this proceeding, we expressed our concern that allowing mobile transmissions in the WCS band creates a significant risk of interference to in-vehicle reception of satellite radio and we asked the Commission to invite comment on specific proposals before it modifies the WCS rules.

We appreciate this opportunity to provide this further input because we strongly disagree with the staff's current proposal. We are concerned that satellite radio reception will be degraded by WCS mobile operations absent effective safeguards. Automakers have installed tens of millions of satellite radios in their vehicles based on the reasonable expectation that the Commission would not allow mobile WCS devices that may interfere with reception. In addition, Sirius XM has spent billions of dollars developing networks on this same understanding

If the Commission modifies the WCS rules as proposed, it should also adopt provisions that will effectively protect satellite radio listeners who experience interference from WCS operations. As an integral part of modified WCS rules, the Commission should require any WCS operator causing interference to satellite radio to

¹ The Alliance is a trade association whose members are: BMW Group, Chrysler Group LLC, Ford Motor Company, General Motors LLC, Jaguar Land Rover, Mazda, Mercedes-Benz USA, Mitsubishi Motors, Porsche, Toyota, and Volkswagen.

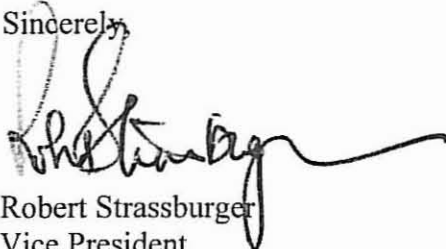
² Commission Staff Requests That Interested Parties Supplement the Record On Draft Interference Rules For Wireless Communications Service and Satellite Digital Audio Radio Service (DA 10-592, released April 2, 2010)

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promptly eliminate the interference or discontinue its operations. The Commission should also adopt a streamlined process to ensure that consumers have an effective remedy if the situation requires government intervention.

Other automobile manufacturers and trade associations have already gone on record in this proceeding with similar concerns. Our common position reflects the importance of satellite radio to our customers and the challenges WCS rule changes would present to us. We hope any revisions to the WCS rules will fully protect the millions of consumers who rely on satellite radio in their automobiles.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Strassburger", with a long, sweeping horizontal line extending to the right.

Robert Strassburger
Vice President
Vehicle Safety and Harmonization

cc: The Honorable Julius Genachowski
The Honorable Michael J. Copps
The Honorable Robert M. McDowell
The Honorable Mignon Clyburn
The Honorable Meredith Attwell Baker
Mr. Julius Knapp